

1 DOMINICA C. ANDERSON (SBN: 2988)
2 TYSON E. HAFEN (SBN: 13139)
3 **DUANE MORRIS LLP**
4 100 N. City Parkway, Suite 1560
5 Las Vegas, NV 89106-4617
Telephone: 702.868.2600
Facsimile: 702.385.6862
E-Mail: dcanderson@duanemorris.com
tehafen@duanemorris.com

6 Attorneys for Defendant
Liberty Mutual Insurance Company
7
8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 WILSHANDA GARNER, individually and on
behalf of all others similarly situated,
12

13 Plaintiff,

14 v.
15 LIBERTY MUTUAL INSURANCE CO., a
Massachusetts company, and JOHN DOE d/b/a
Your Grant Advisor,
16

17 Defendants.

Civil Action No.: 2:20-cv-00836-GMN-VCF

18
19 **STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT LIBERTY MUTUAL
INSURANCE COMPANY TO FILE
RESPONSE TO COMPLAINT**

20 **(FIRST REQUEST)**

21 Defendant Liberty Mutual Insurance Company (“Liberty”), has requested an extension of time
22 within which to answer, move or otherwise respond to the complaint in this matter and plaintiff has
23 no opposition. Accordingly, pursuant to LR IA 6-1 and 6-2, IT IS HEREBY STIPULATED by and
among counsel, that Liberty’s time to answer, move or otherwise respond to the complaint in this
action is extended 30-days from June 1, 2020, through and including July 2, 2020.

24 The request was made by Liberty because it did not know the complaint had been served until
25 June 4, 2020 when plaintiff’s counsel provided a copy of, and then filed, an affidavit of service of the
complaint. Counsel for Liberty’s prior emails sent to plaintiff’s counsel on May 15 and June 2
26 apparently had gone to plaintiff’s counsel’s junk mail folder.
27

This stipulation is filed in good faith and not intended to cause delay.

LAW OFFICES OF CRAIG B.
FRIEDBERG, ESQ.

DUANE MORRIS LLP

By: /s/ Craig B. Friedberg
Craig B. Friedberg (SBN 4606)
Attorneys for Plaintiff

By: /s/ Tyson E. Hafen
Dominica C. Anderson (SBN 2988)
Tyson E. Hafen (SBN 13139)
Attorneys for Defendants *Liberty Mutual
Insurance Company*

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

6-9-2020

DATED: _____